

**SECURITY COMMUNICATIONS**  
**PO BOX 911276**  
**Los Angeles, CA 90091**

February 25, 2014

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW Suite TW-A325  
Washington, DC 20554

Re: Certification of CPNI Filings  
EB Docket No. 06-36

Dear Ms. Dortch:

Security Communications, is filing herewith, in accord with the Commission's Public Notice (DA 14-138 Released February 5, 2014) and 47 C.F.R. Section 64.2009(e), files its Certification of Compliance and an accompanying statement for year ending in December 31, 2013.

Thank you for your attention to this matter.

Respectfully,

  
James J. Crawford

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2014 covering the prior calendar year 2013

Date filed: February 24, 2014

Name of company covered by this certification: SECURITY COMMUNICATIONS

Form 499 Filer ID: N / A

Name of signatory: James J. Crawford

Title of Signatory: Vice President

I, James J. Crawford, certify that I am an officer of Security Communications, and acting as an agent of Security Communications, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R § 64.2001 et seq.

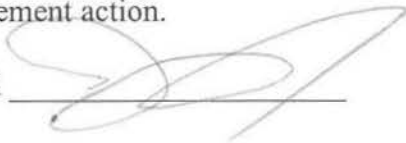
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



Attachments: Accompanying Statement explaining CPNI procedures  
Explanation of actions taken against data brokers  
Summary of customer complaints

## Statement of CPNI Procedures

In compliance with 47 C.F.R § 64.2009(e), I, James J. Crawford, officer of SECURITY COMMUNICATIONS , certify that the company has taken the following steps in compliance with the rules of the Federal Communications Commission which govern the protection of Customer Proprietary Network Information (CPNI).

### **Employee Training and Discipline**

- Trained all employees as to when they are and are not authorized to use CPNI.
- Instituted an express disciplinary process for unauthorized use of CPNI

### **Sales and Marketing Campaign Approval**

- Approval by management for all sales and marketing campaigns.

### **Record – Keeping Requirements**

- Established a system to maintain a record of all sales and marketing campaigns that use customers CPNI, including marketing campaigns of affiliates and independent contractors.
- Ensured that these records include a description of each campaign, the specific CPNI that was used in the campaign, along with products and services offered as part of the campaign.
- Made certain that these records are maintained for a minimum of one (1) year.

### **Establishment of a Supervisory Review Process**

- Established a supervisory review process for all outbound marketing situations.
- Certified that under this review process, all sales personnel supervisory approval of any proposed outbound marketing request for customer approval.

### **Customer Notification of CPNI Changes**

- Established a system under which a customer is notified of any change to CPNI.

### **Notification to Law Enforcement and Customer of Unauthorized Access**

- Established a protocol under which the appropriate Law Enforcement Agency (“LEA”) is notified of any unauthorized access to a customer’s CPNI.
- Ensured that all records of any discovered CPNI breaches are kept for a minimum of two (2) years.

**Summary of Actions  
Taken Against Data Brokers**

In compliance with 47 C.F.R. § 64.2009(e), I, James J. Crawford, acting on behalf of SECURITY COMMUNICATIONS summarize the actions that the Company has taken against Data Brokers within the last year:

**No actions taken against Data Brokers within the last year.**

**Summary of  
Customer Complaints Received**

In compliance with 47 C.F.R. §64.2009 (e), I, James J. Crawford, acting on behalf of SECURITY COMMUNICATIONS, provide a summary of customer complaints received within the last year:

**No Customer Complaints Received**